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November 10, 2023

**VIA ECF**

Hon. James R. Cho, U.S.M.J.  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11021-1804

Re: *IME WatchDog, Inc. v. Gelardi, et al.*  
Case No. 1:22-cv-1032 (PKC)(JRC)

Dear Judge Cho:

We represent defendants Safa Gelardi, Vito Gelardi and IME Companions LLC in the above-referenced matter and write to request permission for Defendants to appear via Zoom at the in-person settlement conference scheduled for November 21, 2023, at 2:00 P.M..

Safa and Vito Gelardi have relocated to Texas, where their children are enrolled in school. Their son is in the fourth grade and their daughter is in pre-kindergarten. Their parental duties preclude them from leaving Texas until December 23<sup>rd</sup>. They would only be available for in-person appearances in New York from December 23<sup>rd</sup> through January 3<sup>rd</sup>.

Respectfully yours,

*/s/ Jonathon D. Warner*

JDW/ks

cc: All counsel (via ECF)